

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

KEILEE FANT et al.,

Plaintiffs,

v.

THE CITY OF FERGUSON,

Defendant.

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Case No.: 4:15-cv-253 AGF

**UNOPPOSED MOTION FOR EXTENSION OF CERTAIN DEADLINES**

Plaintiffs move this Court for an order granting them an extension of certain operative deadlines (ECF 416; ECF 421; ECF 422), and in support state as follows:

1. On November 19, 2021, Plaintiffs filed their Motion for Class Certification. ECF 425.

2. On January 18, 2022, Defendant filed its Opposition to the Motion for Class Certification, ECF 446, along with three Daubert motions directed to three of Plaintiffs' experts, ECF 438 (Demuth); ECF 440 (Vail); and ECF 442 (Gordon).

3. On January 21, 2022, Defendant filed an additional Daubert motion directed to another one of Plaintiffs' experts. ECF 450 (Marlowe).

4. Given the complexity and breadth of the issues raised in Defendant's Opposition to Class Certification and four Daubert motions, and COVID-related issues that have affected the availability of members of Plaintiffs' counsel team to work on the responsive briefs, Plaintiffs request the deadlines for them to file their reply in support of the Motion for Class Certification, their oppositions to the four Daubert motions filed by the City, and any Daubert motions as to the City's experts pertinent to class certification be extended as follows:

- March 1, 2022—Plaintiffs’ reply in Support of Motion for Class Certification;
- March 15, 2022—Plaintiffs’ opposition to the Daubert motions directed at Stephen Demuth (ECF 438) and Eldon Vail (ECF 440); and
- March 29, 2022—Plaintiffs’ opposition to the Daubert motions directed at Colin Gordon (ECF 442) and Justin Marlowe (ECF 450) and any Daubert motions Plaintiffs intend to file as to the City’s experts who are pertinent to class certification.

5. Counsel for Plaintiffs has conferred with counsel for the City regarding the relief sought herein, and counsel for the City has advised that the City has no objection to the relief sought herein.

6. This Motion is made in good faith, and not for purposes of delay.

WHEREFORE, Plaintiffs request that the Court grant the Motion.

Dated: January 31, 2022

Respectfully submitted,

**WHITE & CASE LLP**

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